

RECEIVED
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BY MAIL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
_____ DIVISION

Dawud-Ameen: Hasain _____)
_____)
_____)
_____)
_____)

(Enter above the full name of the Plaintiff[s]
in this action.) _____)
_____)
_____)
_____)
_____)

- vs - _____)
_____)

Vernon Betts, _____)
_____)

Joeseeph V. Neill, _____)
_____)

Laina Favazza, _____)
_____)

Ken Jennings _____)
_____)

Gregory F.X. Daly _____)
_____)

(Enter above the full name of ALL Defend-
ant[s] in this action. Fed. R. Civ. P. 10(a)
requires that the caption of the complaint
include the names of all the parties. Merely
listing one party and "et al." is insufficient.
Please attach additional sheets if necessary. _____)
_____)
_____)
_____)
_____)

Case No. _____
(To be assigned by Clerk
of District Court)

COMPLAINT

- I. State the grounds for filing this case is Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

See claim, Page 1 of 5

II. Plaintiff, Dawud-Ameen: Husain resides at

3238 Maffitt Avenue, St. Louis
street address city county

Missouri, 63113, (314) 478-9770
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

III. Defendant, Vernon Betts lives at, or its business is located at

10 North Tucker Blvd., St. Louis
street address city county

Missouri, 63101
state zip code

(if more than one defendant, provide the same information for each defendant below)

Joseph V. Neill
10 North Tucker Blvd.
St. Louis, Missouri 63101

Laina Favazza
10 North Tucker Blvd.
St. Louis, Missouri 63101

Ken Jennings
10 North Tucker Blvd.
St. Louis, Missouri 63101

Gregory F. X. Daly
1200 Market Street
St. Louis, Missouri 63103

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

See Claim Page 1 of 5 under "First Cause of Action - Trespassing - Parties statements 1 and 2. Also see Claim Page 2 of 5 statements 3, 4 and 5.

V. Relief: State briefly and exactly what you want the Court to do for you.

See claim Page 4 of 5 statements 29 through 39.
See claim Page 4 of 5 statements 30, 31.

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒

NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

See claim Page 2 of 5 under Heading SPECIFICS
statements 6-15 and Page 3 of 5 under Third Cause
of Action statements 19-25 and 26 ON Page 4 of 5.

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☒

NO ☐

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 26 day of June, 2017

Dawud Ameen Husain
Signature of Plaintiff(s)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

Case Number _____

Dawud~Ameen: Husain,

Plaintiff,

v

Vernon Betts,
Joeseeph V. Neill,
Laina Favazza,
Ken Jennings,
Gregory F. X. Daly

) Trespass and Deprivation of Life and
) Liberty and the Unlawful Sale of the
) Property of Dawud~Ameen: 3738
) Maffitt Avenue, Saint Louis Missouri
) Republic, under Color of Law
) (see Exhibit Numbered 1)

Defendants.

First Cause of Action – Trespassing
Parties

In this court of record each of the above-named People, (hereinafter Defendants) and all collectively “Trespassers”, are hereby summoned to answer this very complaint in a plea of Trespassing and Deprivation of Life and Liberty under Color of Law.

1. Dawud~Ameen: (hereinafter Plaintiff), one of the People of THE STATE OF MISSOURI, whose state motto says: “ The welfare of the People is the Supreme Law.” and states;
2. Plaintiff, sues Defendants named above for money damages and restoration of Life, Liberty and the Pursuit of Happiness, and states;

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INTRODUCTION

3. The Defendants exceeded their jurisdiction by either directly, through an agent, or in concert with another did cause harm and injury to Plaintiff.
4. The Defendants names are on an instrument that said they sold the property of Plaintiff. (see Exhibit Numbered 1)
5. The Defendants sold Plaintiff' property through unlawful means, under color of law.

SPECIFICS

6. The Defendants acted in such a way, or failed to act in such a way, that Plaintiff is deprived of his life and liberty.
7. The Defendants failed to act to prevent the loss by Plaintiff, of his life and liberty.
8. Each Defendant is a willing participant in concert with each of the remaining Defendants.
9. At all times mentioned in this action each Defendant is the agent of the other, in doing the acts alleged in this action.
10. Each Defendant either acted or failed to act as obligated by their sworn oaths to uphold The State of Missouri and The United States Constitutions.
11. Each Defendant exceeded his jurisdiction under color of law.
12. Each Defendant acted in concert with each Defendant to affect the unlawful loss property, life and liberty of Plaintiff.
13. Each Defendant has a duty to not cause harm or injury by color of law. (see Exhibit A)
14. Each Defendant has a duty to prove jurisdiction before taking any action.
15. Each Defendant has breach that duty.

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SECOND CAUSE OF ACTION

Claim For Trespassing and Deprivation of Rights under Color of Law

Paragraphs 1 through 15 of First Cause Of Action are included by reference as though fully stated herein.

16. By right, Plaintiff reasonably expects to proceed without harm or injury, secure in his capacities.
17. The Defendants have a legal duty to use due care and not cause harm or injury to Plaintiff, nor interfere with said rights in any way.
18. The Defendants breached that duty by proximately or legally, directly and indirectly, causing harm and injury to Plaintiff.

THIRD CAUSE OF ACTION

Claim For Trespassing and Deprivation of Rights under Color of Law and
Vicarious Liability

19. Paragraphs 1 through 15 of First Cause of Action are included by reference as though fully stated.
20. The purpose of imposing vicarious liability is to insure the costs of injuries resulting from defective actions are placed on the source of the actions and others who make the actions possible rather than on injured persons who are powerless to protect themselves.
21. For a Defendant to be vicariously liable they must play an integral and vital part in the overall production and promotion activity so that the actor is in a position to affect others.
22. At the very least, it must provide a link in the chain of exposing the ultimate victim to the actor.
23. The vicariously liable Defendants must be in the business of controlling, leasing, bailing, licensing the actors.
24. Each Defendant is an agent of the other.
25. Each Defendant has his place in the chain of exposing the Plaintiff to the actors.

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26. Each Defendant is vicariously liable for each instance of injury to Plaintiff.

Law of the Case

27. Constitution State of Missouri.

28. The Constitution for the United States of America of 1789.

Request For Relief

29. For that cause of action therefore Plaintiff Dawud~Ameen: brings his suit.

Wherefore Plaintiff request relief and judgment against Defendants as follows;

30. The damages for the injury caused by Defendants' action are \$100,000 for each Defendant.

31. The damage for the injury caused by each Defendants absence of required action is \$15,000 for each failure to act.

32. Plaintiff requests the return of property taken. (see Exhibit Numbered 1)

33. That the court enters a declaratory judgment that the Defendants have acted not in accordance with the law, but under color of law.

34. That the court enters a declaratory judgment that the Defendants have acted arbitrarily and capriciously.

35. That the Defendants have abused their discretion and have acted not in accordance with the law, but under color of law.

36. That the court enters a declaratory judgment that the Defendants have acted contrary to constitutional right, power or privilege.

37. That the court grants Plaintiff such other equitable relief as the court deems just and proper and;

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- 38. For interest as allowed by law,
- 39. For costs of suit incurred.
- 40. Further, Plaintiff sayeth naught.

Plaintiff says here, and will verify in open court, all herein to be true, correct and not misleading.

By: Dawud-Ameen:

Dawud-Ameen: Husain

Dated this 26 day of June, 2017